

201-14249



To: Rtk Chem/DC/USEPA/US@EPA, Oppt.ncic@epamail.epa.gov  
cc: Leslie Scott/DC/USEPA/US@EPA, Richard Hefter/DC/USEPA/US@EPA, Oscar  
Hernandez/DC/USEPA/US@EPA, santav <santav@cpchem.com>, MARASF <MARASF@cpchem.com>,  
Craig FARR <craig.farr@atofina.com>, Tom WERKEMA <tom.werkema@atofina.com>,  
Jim\_Keith@americanchemistry.com

Subject: HPV submission - MSA (registration #

Attached is the HPV submission for methane sulfonic acid made on behalf of ATOFINA Chemicals, Inc.  
and Chevron Phillips LP. Please let me know if you have any problems opening the files.

Ann Tveit, Ph.D., DABT  
ATOFINA Chemicals, Inc  
2000 Market St.  
Philadelphia, PA 19103  
phone 215-419-5604  
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email ann.tveit@atofina.com MSA-iuclid jan10-2003.zip MSA letter to EPA 1-10-03.zip

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ATOFINA Chemicals, Inc.

January 10, 2002  
Submitted electronically to:  
[Chem.rtk@epa.gov](mailto:Chem.rtk@epa.gov)  
[Oppt.ncic@epa.gov](mailto:Oppt.ncic@epa.gov)

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

RE: Status of Commitment Under U.S. HPV Program - Registration #  
Dear Ms. Whitman:

This submission is being made by ATOFINA Chemicals, Inc and Chevron Phillips Chemical Company LP regarding Methane sulfonic acid (MSA, CAS Number 75-75-2), which is currently sponsored under the U.S. HPV Challenge Program.

Table 1 summarizes the available data for MSA which are described in detail in the attached IUCLID dossier. The data used to characterize the HPV Challenge endpoints for MSA were identified either in company proprietary files, the peer-reviewed literature, and/or calculated using widely accepted computer modeling programs.

Based on the available physical/chemical and human health data, we plan to conduct a 90 day oral toxicity study using OECD Guideline 408 (adopted: 21<sup>st</sup> January 1998) which will fulfill the repeated dose toxicity endpoint and provide information on reproductive toxicity. In addition, we will submit a technical discussion for fulfillment of the hydrolysis endpoint.

If you have technical questions, please contact Ann Tveit at (215) 419-5604 or via e-mail at [ann.tveit@atofina.com](mailto:ann.tveit@atofina.com).

Sincerely,

Craig Farr, Ph.D., DABT  
Associate Director,  
Product Stewardship and Toxicology

Cc: Richard Hefter, EPA